

November 16, 2001

**VIA HAND DELIVERY**

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, Massachusetts 02110

Re: *Western Massachusetts Electric Company's Service Quality Plan, 2002-2004, D.T.E. 99-84/D.T.E. 01-71D*

Dear Secretary Cottrell:

Attached as a supplement to Western Massachusetts Electric Company's ("WMECO") October 29, 2001 Service Quality ("SQ") Plan filing to the Department of Telecommunications and Energy ("Department") in the above-referenced proceedings, please find a redline/strikeout version of WMECO's SQ Plan compared against the Department's SQ guidelines, issued in D.T.E. 99-84 (June 29, 2001).

At a meeting with Department staff on November 14, 2001, the Department requested a number of changes to WMECO's SQ Plan (a number of which also amend the Service Quality guidelines issued by the Department on June 29, 2001). WMECO's supplemental filing incorporates almost all of the changes requested by Department staff on November 14, 2001. However, there are three requested changes that WMECO has modified on whole or in part. These are as follows:

(1) Definition of "Operating Area." WMECO's definition is the definition included in the Department's June 29 SQ guidelines. WMECO used this definition, recognizing WMECO's four Operating Areas, in developing its reliability benchmarks. Any change to this definition is a major issue for WMECO and a major change to the June 29 SQ guidelines. WMECO would have commented on such a definitional change had it known it was under consideration by the Department.

WMECO's service territory covers 59 municipalities across a diverse geographical area. Weather often affects its Operating Areas very differently. Storms which affect the Berkshires may not even reach the Springfield area. Changing the definition of Operating Area for WMECO has the affect of driving

decisions on resources and reliability improvements occurring in the most significant spot to a focus on weather. This is not a cost-effective use of resources. While it may be appropriate for those electric companies with a relatively compact service territory (e.g., Cambridge Electric Light Company and Fitchburg Gas and Electric Light Company) to equate Operating Area with service territory, it is not appropriate for WMECO, and the Department should recognize that a valid distinction between companies exists. If the Department wishes to use the same language for all electric companies, WMECO's definition is broad enough to provide for those companies with only one Operating Area; the alternative language proposed is not.

In sum, in the Department's October 22, 2001 memorandum, WMECO was directed to justify any changes to the June 29 guidelines. WMECO does not believe the proposed change to the Operating Area definition is justified or warranted.

(2) Wording of Section IV, Staffing Level Benchmark. WMECO's recommended change is the inclusion of two words to Section IV. The two words "as applicable" are inserted in the only sentence in this section to indicate that the applicability of the Staffing Level Benchmark is dependent on the interpretation of the General Laws.

(3) General Reservation language. WMECO has added a second sentence to Section XII, General Reservation. The first sentence of this section is a statement concerning the Department's authority to change WMECO's guidelines/plan. It may be unclear what is meant by WMECO including such a statement. WMECO wishes to eliminate any confusion that WMECO is somehow waiving its right to participate in any changes proposed by the Department. Therefore, the General Reservation section would now read:

"The Department retains the discretion to waive or depart from any provision of WMECO's SQ Plan as the interests of fairness may require. The process for any changes will provide WMECO with the opportunity to comment and provide its position to the Department."

Please contact Don Bishop at (617) 345-4622 should you have any questions in regard to the above.

Sincerely,

Stephen Klionsky

Mary L. Cottrell, Secretary

November 16, 2001

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Attachment

cc: Caroline O'Brien, HO  
Service List, D.T.E. 99-84